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**GARY CALLAHAN AND SALLY CALLAHAN IN THEIR CAPACITY AS  
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**MARKEL AMERICAN INSURANCE COMPANY**

**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

**GARY CALLAHAN AND SALLY  
CALLAHAN IN THEIR CAPACITY AS  
TRUSTEES FOR THE CALLAHAN 2008  
REVOCABLE TRUST,**

Plaintiffs,

vs.

**MARKEL AMERICAN INSURANCE  
COMPANY,**

Defendant(s).

**Case No.: 2:20-cv-00703-TLN-DB**

**STIPULATION TO AMEND  
SCHEDULING ORDER AND ORDER**

**JUDGE: TROY L. NUNLEY  
LOCATION: EASTERN DIST. COURT  
501 I STREET  
COURTROOM 2  
SACRAMENTO, CA**

**TO THE HONORABLE COURT:**

Counsel representing plaintiffs Gary Callahan and Sally Callahan in their capacity as

Trustees for the Callahan 2008 Revocable Trust (“Plaintiffs”) and counsel representing defendant Markel American Insurance Company (“Defendant”) hereby enter into the following stipulation jointly asking this Court to amend its Initial Pretrial Scheduling Order.

The timing of this case, through a pandemic where courts were closed and travel and in-person meetings were prohibited, has placed all parties in an atypical position where the discovery deadlines provided by the Court were untenable. At this time, the case is not ready for trial. The parties have attempted to determine what needs to be completed prior to trial readiness and in connection therewith have agreed on a revised case management schedule which they respectfully submit and request consideration by the Court. Based thereon, the parties therefore propose the following stipulated amendments/additions to the Court’s Initial Pretrial Scheduling Order:

August 20, 2021 – Parties to complete “meet and confer” efforts regarding potential settlement outside mediation and to schedule mediation.

December 9, 2021 – Fact discovery cutoff and supplemental expert disclosure deadline.

January 7, 2022 – Last day to mediate and expert discovery cutoff.

January 14, 2022 – Parties to submit trial readiness statement and last day to file dispositive motions.

Respectfully submitted,

Dated: August 10, 2021

CLAYEO C. ARNOLD  
A Professional Law Corporation

By: /s/ Anthony M. Ontiveros

Anthony M. Ontiveros  
Attorney for Plaintiffs

Dated: August 10, 2021

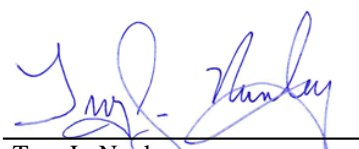
CLYDE & CO US LLP

By: /s/ Conte C. Cicala

Conte Cicala  
Attorneys for Defendant MARKEL  
AMERICAN INSURANCE COMPANY

**IT IS SO ORDERED.**

Dated: August 16, 2021

  
Troy L. Nunley  
United States District Judge